

**From:** [Barbara Aldridge](#)  
**To:** [Wren Stenger](#)  
**Cc:** [Lydia Johnson](#); [Garyg Miller](#); [Barbara Nann](#); [Dipanjana Bhattacharya](#); [Susan Roddy](#); [Barbara Aldridge](#); [Mark Peycke](#)  
**Subject:** Re: Fw: Gulfco Removal Action AOC Comments  
**Date:** 01/15/2010 01:35 PM

---

Wren,

Gary feels that the PRPs have made a good faith effort on this AOC, and most of their changes are reasonable. The biggest issues he had were -- (Gary, pls let me know if I captured this correctly)

- differences in due dates for the final report (EPA wanted 14 days, & they want 45 days "after receipt of all necessary documentation" - too open-ended)

- differences in progress report frequency (EPA wanted every 14 days, they want monthly)

On the plus side, they have suggested a number of efficiencies that will shorten the timeframe needed to complete a removal (i.e., using the work plan already drafted instead of the outline SOW followed by a work plan., and using the RI FS project manager & the QA QC plan, already approved for the RI FS). And they have not asked for some of the things they wanted in the past - ie doing the whole site as a removal, abbreviated risk assessment, the guarantee of a no action ROD, etc.

On the enforcement side, they left Parker Drilling off the AOC (the group cannot speak on their behalf) and replaced Sequa with Chromalloy. (Sequa is the parent of Chromalloy, who was a prior owner). Legal will need to weigh in on that one.

Barbara J. Aldridge, Enforcement Officer  
U. S. EPA, Region 6, Superfund Division  
Enforcement Assessment Section, 6SF-TE  
[aldridge.barbara@epa.gov](mailto:aldridge.barbara@epa.gov)

Phone (214) 665-2712

Fax (214) 665-6660

Confidentiality Warning: This e-mail may be privileged and/or confidential and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.

▼ [Re: Fw: Gulfco Removal Action AOC Comments](#)

**Re: Fw: Gulfco Removal Action AOC Comments** 

**Wren Stenger** to: Barbara Aldridge

01/14/2010  
04:39 PM

Cc: Lydia Johnson

---

Ok, let me know big issues once you review. Thanks  
▼ Re: Fw: Gulfco Removal Action AOC Comments

Re: Fw: Gulfco Removal Action AOC Comments 

**Barbara Aldridge** to: Wren Stenger

01/14/2010  
01:07 PM

Cc: Lydia Johnson

---

Wren,

I forwarded you the previous msg to keep you informed, and let you know that the PRPs **did** forward their comments - when we met on 1/5 we didn't know for sure when we would see their mark-up. The team is meeting today at 3p today to discuss, even tho Barbara Nann is out on leave until next Thursday. Gary's first impression on a first glance (we just got this today and it came from the PRP's contractor, NOT directly from Tom M) is that this could work, but it needs a legal look. Gary was going to discuss with Mark P. and ask if he wants to review it or should we wait for BN.

Barbara J. Aldridge, Enforcement Officer  
U. S. EPA, Region 6, Superfund Division  
Enforcement Assessment Section, 6SF-TE  
aldridge.barbara@epa.gov  
Phone (214) 665-2712  
Fax (214) 665-6660

Confidentiality Warning: This e-mail may be privileged and/or confidential and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.

▼ Re: Fw: Gulfco Removal Action AOC Comments

**Re: Fw: Gulfco Removal Action AOC Comments** 

**Wren Stenger** to: Barbara Aldridge

01/14/2010  
12:48 PM

Cc: Lydia Johnson

---

Are there any issues? If so, what?

▼ Fw: Gulfco Removal Action AOC Comments

**Fw: Gulfco Removal Action AOC Comments**

**Barbara Aldridge** to: Wren Stenger, Lydia Johnson

01/14/2010  
10:02 AM

Cover letter from Gulfco Group to Mariani on the removal aoc

Barbara J. Aldridge, Enforcement Officer  
U. S. EPA, Region 6, Superfund Division  
Enforcement Assessment Section, 6SF-TE  
aldridge.barbara@epa.gov  
Phone (214) 665-2712  
Fax (214) 665-6660

Confidentiality Warning: This e-mail may be privileged and/or confidential and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.

----- Forwarded by Barbara Aldridge/R6/USEPA/US on 01/14/2010 10:01 AM -----

**Fw: Gulfco Removal Action AOC Comments**

**Garyg Miller** to: Barbara Aldridge, Barbara Nann, Dipanjana Bhattacharya, Susan Roddy

01/14/2010  
08:49 AM

Cc: Carlos Sanchez

---

FYI, the Gulfco PRP Group's cover letter to their markup of the removal AOC.

Gary Miller, P.E.  
Remediation Project Manager  
EPA Region 6 - Superfund (6SF-RA)  
(214) 665-8318  
miller.garyg@epa.gov

----- Forwarded by Garyg Miller/R6/USEPA/US on 01/14/2010 08:47 AM -----

From: "Eric Pastor" <eric.pastor@pbwllc.com>  
To: Garyg Miller/R6/USEPA/US@EPA  
Date: 01/14/2010 08:40 AM  
Subject: Removal Action AOC Comments

---

Hi Gary –

Per our conversation yesterday, attached is a copy of the Gulfco Group's comments on the removal action AOC as transmitted by Liz Webb to Tom Mariani and Barbara Nann. The comment letter is attached to this e-mail. I will send separate e-mails with a redlined version of the AOC and a clean copy of the AOC with suggested revisions. Please let me know if you have any problems accessing these documents or do not receive all three e-mails.

Thanks.

Eric Pastor  
Pastor, Behling & Wheeler, LLC  
2201 Double Creek Drive, Suite 4004  
Round Rock, Texas 78664

512-671-3434

[attachment "1-12-10 Removal Action AOC comment letter.pdf" deleted  
by Wren Stenger/R6/USEPA/US]